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6 Attorneys for Plaintiffs
PHP INSURANCE SERVICE, INC.; PHP
7 GROUP, INC.; and TRUNG TRAN

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

10
11 PHP INSURANCE SERVICE, INC.; PHP
GROUP, INC.; and TRUNG TRAN,

12 Plaintiffs,

13 v.

14 GREENWICH INSURANCE COMPANY,

15 Defendant.
16

CASE NO. 5:15-cv-00435-BLF

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINES AND
CONTINUING CASE MANAGEMENT
CONFERENCE**

Hon. Beth Labson Freeman

1 **STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING DEADLINES AND**
2 **CONTINUING CASE MANAGEMENT CONFERENCE**

3 TO THE COURT, ALL PARTIES, AND ALL PARTIES' ATTORNEYS OF RECORD
4 HEREIN:

5 PLEASE TAKE NOTICE that Plaintiffs PHP INSURANCE SERVICE, INC.; PHP
6 GROUP, INC.; and TRUNG TRAN (collectively, "Plaintiffs") and Defendant GREENWICH
7 INSURANCE COMPANY ("Defendant"), by and through counsel and pursuant to Federal Rule
8 of Civil Procedure 6 and Local Rule 6, hereby stipulate to and request an Order for extensions of
9 time for Plaintiffs and Defendant (collectively, "Parties") to:

- 10 1. Submit a discovery plan, initial disclosures, and case management statement(s)
11 ("Discovery & CMS Deadlines"), which deadline is currently set for July 16, 2015; and
12 2. Submit ADR certifications and a stipulation to ADR process or Notice of Need for
13 ADR Phone Conference ("ADR Deadlines"),

14 as set forth below. The Parties also hereby stipulate to and request an Order for a continuance of
15 the Initial Case Management Conference ("CMC"), currently set for July 23, 2015 at 1:30 p.m., as
16 set forth below:

17 WHEREAS, Plaintiffs filed the Complaint on January 30, 2015;

18 WHEREAS, the Parties on February 19, 2015 stipulated for an extension of time for
19 Defendant to file its response to the Complaint;

20 WHEREAS, Defendant filed its Answer on March 6, 2015;

21 WHEREAS, the Parties on March 13, 2015 stipulated to a briefing schedule for their
22 respective summary judgment/partial summary judgment motions (collectively, "Motions") and a
23 continuance of the CMC, and the Court issued an order approving the briefing schedule and
24 continuing the CMC on April 2, 2015;

25 WHEREAS, the Parties now agree and stipulate to extend the Discovery & CMS
26 Deadlines and the ADR Deadlines to 45 days after the Court issues its rulings on the Motions
27 ("Rulings"), and to continue the CMC to 60 days after the issuance of the Rulings;

28 WHEREAS, there is good cause for this extension of time because the Parties are

1 attempting to preserve the resources of the Court and the Parties while they await the Rulings; and

2 WHEREAS, there have been previous extensions of time in this action of Defendant's
3 original deadline for responding to the Complaint and of the CMC, but it appears that no prejudice
4 will result from the requested extensions of time and continuance because such extensions and
5 continuance will not affect the overall schedule of the action;

6 NOW, THEREFORE, the Parties agree and stipulate to and request an Order for
7 extensions of time of the Discovery & CMS Deadlines and the ADR Deadlines up to and
8 including 45 days after the Court issues the Rulings;

9 FURTHER, the Parties agree and stipulate to and request an Order continuing the CMC to
10 60 days after the issuance of the Rulings.

11 Respectfully submitted,

12 DATED: July 10, 2015

HANSON BRIDGETT LLP

14 By: /s/ Alexander J. Berline

ALEXANDER J. BERLINE

15 MILES C. HOLDEN

16 Attorneys for Plaintiffs PHP INSURANCE
17 SERVICE, INC.; PHP GROUP, INC.; and
TRUNG TRAN

18 DATED: July 10, 2015

TROUTMAN SANDERS LLP

20 By: /s/ Ryan C. Tuley


21 RYAN C. TULEY

THOMAS H. PROUTY

22 Attorneys for Defendant GREENWICH
INSURANCE COMPANY

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 DATED: July 10, 2015

24 
26 HON. BETH LABSON FREEMAN
27 UNITED STATES DISTRICT COURT
28 JUDGE